

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	Case No.: 19-CV-10796) (DLC)
	:	
-against-	:	
	:	DECLARATION OF
INTERNATIONAL INVESTMENT GROUP LLC,	:	STEPHEN B. SELBST IN SUPPORT
	:	OF DISTRIBUTION OF FUNDS
Defendant.	:	<u>FROM COLLECTION ACCOUNTS</u>
	:	
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STEPHEN B. SELBST, an attorney duly admitted to practice law before
the Courts of the State of New York and before this Court, declares as follows:

1. I am a partner of the law firm of Herrick, Feinstein LLP (“Herrick”), attorneys for IIG Structured Trade Finance Fund Ltd. (“STFF”) and IIG Global Trade Finance Fund Ltd. (“GTFF”). I am personally familiar with the facts set forth herein.

2. The purpose of this declaration is to annex relevant documents in support of the request on behalf of STFF and GTFF to the Court requesting an order directing the distribution of certain funds held in the Collection Accounts maintained by Bank Leumi in connection with loans extended to borrowers by affiliates of defendant International Investment Group LLC (“IIG”). A full statement of the facts is contained in the letter to the Court filed contemporaneously herewith. Initially capitalized terms, unless separately defined, shall have the meanings assigned to such terms in the letter being filed contemporaneously with the Court.

3. Annexed hereto as Exhibit A is a true and correct copy of the order dated October 23, 2019 issued by the Grand Court of the Cayman Islands appointing Alex Lawson and Christopher Kennedy of the firm of Alvarez & Marsal Cayman Islands Limited as Joint Official Liquidators of GTFF.

4. Annexed hereto as Exhibit B is a true and correct copy of the order dated January 13, 2020 issued by the Grand Court of the Cayman Islands appointing Alex Lawson and Christopher Kennedy of the firm of Alvarez & Marsal Cayman Islands Limited as Joint Official Liquidators of STFF.

5. Annexed hereto as Exhibit C are copies of the Compania Agreements.

6. Annexed hereto as Exhibit D are copies of the participation certificates issued by IIG to GTFF, STFF, TriLinc and Malta Bank in respect of the Compania Loans.

7. Annexed hereto as Exhibit E is a copy of the February 2020 Bank Leumi account statement for the Compania Collection Account .

8. Annexed hereto as Exhibit F are copies of CCP Agreement, as amended.

9. Annexed hereto as Exhibits G are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the CCP Loans.

10. Annexed hereto as Exhibit H is a copy of the February 2020 Bank Leumi account statement for the CCP Collection Account.

11. Annexed hereto as Exhibit I is the Consorcio Agreement.

12. Annexed hereto as Exhibits J are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Consorcio Loans.

13. Annexed hereto as Exhibit K is a copy of the February 2020 Bank Leumi account statement for the Consorcio Collection Account.

14. Annexed hereto as Exhibit L is the Citricola Agreement.

15. Annexed hereto as Exhibits M are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Consorcio Loans.

16. Annexed hereto as Exhibit N is a copy of the February 2020 Bank Leumi account statement for the Citricola Collection Account.

17. Annexed hereto as Exhibit O is the Imperio Agreement.

18. Annexed hereto as Exhibits P are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Imperio Loans.

19. Annexed hereto as Exhibit Q is a copy of the February 2020 Bank Leumi account statement for the Imperio Collection Account.

20. Annexed hereto as Exhibit R is the Ivorfield Agreement.

21. Annexed hereto as Exhibits S are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Ivorfield Loans.

22. Annexed hereto as Exhibit T is a copy of the February 2020 Bank Leumi account statement for the Ivorfield Collection Account.

23. Annexed hereto as Exhibit U is the Proexpo Agreement.

24. Annexed hereto as Exhibits V are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Proexpo Loans.

25. Annexed hereto as Exhibit W is a copy of the February 2020 Bank Leumi account statement for the Proexpo Collection Account.

26. Annexed hereto as Exhibit X is the Prosesamo Agreement.

27. Annexed hereto as Exhibits Y are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Prosesamo Loans.

28. Annexed hereto as Exhibit Z is a copy of the February 2020 Bank Leumi account statement for the Prosesamo Collection Account.

29. Annexed hereto as Exhibit AA is the Saldana Agreement.

30. Annexed hereto as Exhibits BB are copies of the participation certificates issued by IIG to GTFF, STFF and TriLinc in respect of the Saldana Loans.

31. Annexed hereto as Exhibit CC is a copy of the February 2020 Bank Leumi account statement for the Saldana Collection Account.

32. Annexed hereto as Exhibit DD is the Valle Agreement.

33. Annexed hereto as Exhibits EE are copies of the participation certificates issued by IIG to GTFF and STFF in respect of the Valle Loans.

34. Annexed hereto as Exhibit FF is a copy of the February 2020 Bank Leumi account statement for the Valle Collection Account.

35. Annexed hereto as Exhibit GG is the Sancor Agreement.

36. Annexed hereto as Exhibits HH are copies of the participation certificates issued by IIG to STFF, TriLinc and Malta Bank in respect of the Valle Loans.

37. Annexed hereto as Exhibit II is a copy of the February 2020 Bank Leumi account statement for the Valle Collection Account.

I declare under penalties of perjury under the laws of the United States of America that the foregoing is true and correct. Executed as of this 16th day of April 2020.

/s/ Stephen B. Selbst
Stephen B. Selbst